

This comment is to bring FCC's attention on the policy set forth by All VRS providers. I have encountered this conflict on daily basis.

This is specific issue known as "Announcement" Even FCC recognize this as "standard" (see http://www.fcc.gov/cgb/dro/trs/con_trs.html)

In my business, with standard announcement implemented, i get hang up or being degraded because of "abnormal" greeting. The normal greeting is "This is Michael Gallagher of Gardenia Victoria" just as any normal person calling. This connects me to call reciever then I explain about the VRS system. This works. I have contacted Sorenson, CSD and they said I have to let the interpreter know every time I call them. I do that everytime for 4-6 hours a day. I have counted statistics of these connections. 72% of these interpreters forget not to announce and went ahead. They apologize profusely every time but it does not get my business back. They explained that the daily grind is so rooted in their habits to announce. I found myself worked up with anxiety in the begining of call and "stress" out the interpreter not to announce. This does have negative impact on our overall conversation.

This brings me to file this request to create a new policy for all VRS providers.

All VRS provider must do the following when recieving calls:

1. Ask the deaf person if he/she wants "standard" announcement or prefer other greetings.
2. This applies to begining and end of conversation and answering machine.
3. Obtain the deaf person's name to be included in standard announcement. It can be as " This is Michael Gallagher using VRS to communicate with you, have you used this system before?"
4. VRS providers cannot use their own company name in announcements since all telephone service providers funded the VRS pool. Unless they are asked by either parties, they can provide all the information necessary to carry out the business.
5. Basically, all VRS provider must accomodate to deaf person and his/her best interest.
6. All VRS provider shall provide selection of male or female or either interpreter as part of the log in settings. That way the calls will be routed to appropriate interpreters.

To support this request, the basic purpose of the ADA is to prohibit discrimination in employment (Title I), ensure equal access to services of state and local governments (Title II), and ensure equal access to "places of public accommodations" such as private businesses and/or non-profit organizations (Title III).

One of the major areas of equal access is
"effective communication" for persons who are deaf , hard of
hearing or late-deafened, or with speech disabilities.

This policy should apply to all interpreter facets of public
services such as but not limited to "On Site"; "VRI"; "VRS".
Since most interpreter agencies now employ all these three facets,
and they seem to make them all the same application as
announcement. I do believe that FCC and DOJ have genuine interest
in this request.

If you need to contact me by phone, call me at 240.423.9756.